

Maritime Administration
Comments on the Navigation Study Draft Interim Report

General Comments

The collaborative process proposed as an integral part of the revised Navigation Study is an innovative and timely attempt by the Corps of Engineers to include the Mississippi and Illinois River Basin Stakeholders in the Study Process. We concur that this is a responsible approach to include those who have an interest in the river basins in this effort. However, we are concerned that the Navigation Study Draft Interim Report has shifted its' emphasis toward systemic environmental issues, and does not contain more information pertaining to navigation and the Study's effort to reduce congestion at the locks. The Interim Report does not reflect the ten years of information developed concerning congestion to commercial navigation. Nor does it project qualitatively the potential need for large-scale navigation improvements or recommend small-scale measures that could be implemented in the near term to alleviate congestion on an interim basis.

Response. The Interim Report has been expanded to include references to the navigational aspects of the study. The report contains significant amount of environmental discussion since this area represents the biggest change in the study.

Due to the fact that this study was authorized specifically to investigate the congestion at the Locks on the Upper Mississippi and Illinois Rivers and the fact that the Corps is concurrently initiating work on the Mississippi River Comprehensive Basin Study: We are also concerned that, while we recognize the importance of including environmental mitigation in the revised study effort, environmental issues that are not site specific to potential navigation improvements are being given disproportional attention. Systemic environmental issues should be addressed as a part of the Comprehensive Basin Study that is currently authorized. Navigation improvements and their concurrent site-specific environmental impacts should then be included as a component of the Comprehensive Basin Study.

Response. The navigation study has been restructured to address both navigation improvement planning and ecosystem restoration improvements. The navigation study will provide the basis for establishing environmental goals and objectives from bluff to bluff. The Comprehensive Study will embrace the dual overarching national goals of flood damage reduction, and associated environmental sustainability. Economic issues within the floodplain will be addressed in the Comp Study.

Specific Comments by section

Preface:

Pg. 2 Para 3 Preliminary conclusions and recommendations should identify the potential for large-scale navigation improvements as a solution to the projected scenarios that include the new Farm Bill.

Response. The need for navigations improvements will be fully evaluated in the feasibility study. The preliminary conclusions have been revised in the final Interim Report.

Participating Organizations:

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Pg. 11 Bullets Insert achieves an economically sustainable system.
Insert Develop Operation and Maintenance Program to achieve economic, social and environmental sustainability.
Insert Address international competitiveness.

Response. Bullets have been revised.

Pg. 12 Sec 1.3 Include the concept that the study area is responsible for over 60% of the grain that is exported by our country.

Response. Concur.

Pg. 16 Sec 1.5 Include at this point the Iowa DOT Modal Comparison Chart and discuss the environmental and social benefits of moving products by water. E.g. Fewer engines required to move the same tonnage results in fuel economy, less air pollution, safety benefits resulting from fewer trucks on the roads and fewer rail crossings, etc.

Response. See revisions to paragraph 1.4.3.

Pg. 16 Sec 1.6 Include the identification of the economic impact of grain and other product movements by water. For example: Economic benefits derived from commercial navigation, shipper savings, economic development and navigation related employment provided economic benefits of \$ _____ Billion.

Response. See revisions in paragraph 1.4.1.

Pg. 21 Sec 1.71.5 The Engineering Coordinating Committee also met with members of RIAC to review the practical implications of several of the proposed small and large-scale alternatives.

Response. Concur.

Pg. 32 Sec 1.8.2 We were under the impression that Congestion Tolls and Lock Scheduling had been explored already with RIAC, AWO and the Inland Waterways User Board. Neither of these concepts have any value in the practical world of operating commercial vessels on the inland river system.

Response. These measures were screened out in the original study. The Corps has agreed to re-evaluate in the restructured study.

Pg.33 Sec 1.8.4 AWO was at this meeting.

Response. Concur.

Pg. 37 Recreational boating should also include oil and gas contamination of the river, entrainment of fish and sediment resuspension especially in backwaters.

Response. Recreational impacts are briefly discussed in Table 7. It is recognized that the recreational boating industry contributes to the cumulative impacts on the river system.

Pg. 39 Sec 2.3.2 Insert Bullet: Modernize the Inland Navigation Infrastructure.

The goals for sustaining the navigable waterway must include the concepts of modernizing the navigation infrastructure. If all we had to do was maintain the existing navigation infrastructure we would not be experiencing congestion now and there would not be a navigation study!

Response. Section has been deleted. Goals and objectives have been revised.

Pg. 41 Sec 2.3.5 Citing results only from the LTRM and HNA public involvement surveys gives the impression that the public is only concerned about environmental issues.

Response. See section 4.3

Pg. 44 Sec 2.4.2.1.3 Where did the 50 towing companies operating on the Upper Miss come from? How was it determined that only 58% of the commercial docks cited in the study area provided services for shipping or receiving commodities? We feel these numbers are understated and are not correct.

Response. Data cited was contained in USACE, report titled UMR-IWW System Navigation Study Fleeting Analysis Interim Report, dated April 2000. Please provide updated information if available.

Pg. 49 Sec 2.4.2.1.10 There should be some discussion in this section explaining peak demand delays at the locks and their economic impact. Average delay time mask the true impact of lock congestion during peak shipping periods. Our Nations highways are designed by the Federal Highway Administration to accommodate rush hour demand, not average daily demand. This design concept has been accepted as the standard design requirement by the National Academy of Sciences - Transportation Research Board. There is no logical reason this same standard should not be applied to inland navigation infrastructure design.

Response: The section has been modified to also present total hours of delay in addition to average delay at each lock site, and the question of traffic seasonality will be reviewed in the feasibility study. However, the service design level of potential infrastructure improvements is the result of the feasibility study investigations, not a beginning assumption.

Pg. 58 Sec 2.4.2.2.7 Table 7 provides no frame of reference to determine the significance of the numbers.

Response. Noted.

Pg. 60 Sec 2.4.2.2.8 Insert Avoid and Minimize Program, St. Louis District

Response. Concur.

Pg. 62 Sec 2.4.2.4 If Regional economic impacts are cited for recreation they should also be included for navigation infrastructure improvements.

Response. The RED will be undated in the feasibility study.

Pg. 81 Sec 2.5.1.1 The 50% timesavings resulting from not having to double lock a fifteen-barge tow is understated. Rock Island District and St. Louis District should have data to provide a more accurate timesaving percentage. Our experience indicates a time savings, from approval to enter the lock until a tow clears the lock, of 66-70%.

Response. The time savings indicated is an average and will vary by site and river conditions. This will be reflected in the feasibility study.

Pg. 88 Sec 2.5.1.1.1.4 & 5 Congestion Tolls/Lockage Time Charges and Scheduling & Trading Permits have been discussed in depth with RIAC, RIETF the Coast Guard and Corps of Engineers. While these concepts may have merit from an academic perspective; they simply will not work for a variety of economic and safety reasons on the inland waterways. (See comments for Pg 32 Sec 1.8.2)

Response. The Corps has agreed to re-evaluate in the restructured study.

Pg. 96 Sec 2.5.1.2 Why don't you cite the Navigation Pool Water Level Management programs in the three Upper Mississippi River Corps Districts? This program is a classic "Win / Win Program".

Response. See section 2.3.2.2.9.

Pg. 100 Sec 2.5.1.2.2.2 Items f. and g. "enforcing a nine foot draft and restricting traffic until buoys are in place at the beginning of the navigation season" are issues that each barge line and shipper are already responsible for taking into consideration. Under our "Free Enterprise Economic System" each company must make its own decision about operating conditions. If they make the wrong decision they are responsible for the consequences and will probably not be in business long.

Response. Noted.

Pg. 102 Table 27 I would like to see the contents of this table.

Response. See Design Memorandum #24 from St. Louis District.

Pg. 104 Sec 2.5.1.3.2 This section must have been written by someone who has never had a course in transportation economics!!! Because towboats draw 8.5 feet of draft, a six foot draft restriction would result in the cessation of commercial navigation! Seasonal closures of the Upper Mississippi River Basin, which only has an eight to nine month navigation season, would be an economic disaster to the Upper Midwest. We would like the opportunity to discuss this topic with the author!

Response. Ecosystem restoration measures that include traffic restrictions will be fully evaluated for all impacts. Likewise, navigation improvement measures that impact the ecosystem will be evaluated. The stakeholders of the system including MARAD will be involved in this evaluation.

Pg. 107 Sec 2.5.2.1 Table 28 Alternative 2 should also reference recreational traffic.

Response. Noted.

Pg. 121 Sec 1. Conclusion: We don't feel that there is a consensus concerning "a new system-focused statutory authority that would provide for justified navigation improvements, and O & M authority to operate and maintain the system for both navigation and the environment, and expanded

authorities to provide additional ecosystem restoration opportunities and address floodplain management needs related to the navigation system.". The Navigation Study should confine itself to navigation congestion (as it was authorized) and related site specific environmental mitigation. System wide authority, navigation improvements, flood control and environmental mitigation should be addressed as a part of the Upper Mississippi River Basin Comprehensive Plan.

Response. Noted. Additional evaluation will be completed in the feasibility study.

Pg. 121 Navigation Improvements: The reason we have a Navigation Study is to determine what must be done to alleviate congestion within the existing Navigation Infrastructure. Therefore, the feasibility study obviously will recommend some type of improvements. This paragraph should be written in a positive manner.

Response. Noted. The need for navigation improvements will be fully evaluated in the feasibility study.

Pg. 121 Operation and Maintenance: This paragraph would be the appropriate place to discuss the current and projected O & M backlog, the ever increasing demands placed on this program and how important it is to our Nation.

Response. This section has been revised. Discussion of backlog O&M takes place in section 2.3.2.1.10.

Pg. 122 Operation and Maintenance: Additional thought and discussion must be given and we do not agree with the tentative conclusion "that the ongoing and cumulative ecosystem impacts of operation and maintenance of the existing navigation system would be most appropriately addressed through a programmatic authority funded as construction under the Construction, General account."

Response. Noted. This issue will be fully evaluated in the feasibility study.